## STONE MAGNANINI

## COMPLEX LITIGATION

September 18, 2024

## VIA CM/ECF

Hon. Michael A. Hammer
Martin Luther King Building and U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: *United States v. Jobadiah Weeks*, 19-cr-877-CCC

Dear Judge Hammer:

On September 6, 2024, we filed a motion seeking to modify Mr. Weeks' conditions of release. [DKT. 362]. On September 11, we informed the Court by email that we had further discussions with the Government and Pretrial Services and that we were withdrawing the filed motion [DKT. 362] and that we intended to file a revised motion in the near future. Yesterday, September 17, we filed a new motion seeking to modify Mr. Weeks' conditions of release. [DKT. 363] and chambers directed us to file a letter withdrawing the September 6 motion (if that is what we so intended).

We respectfully move for the Court to permit us to withdraw the September 6 motion [DKT. 362]. The only motion that we ask the Court to consider is the newly-filed September 17 motion [DKT. 363].

We thank the Court for its time and consideration of this matter.

Respectfully submitted,

/s/ David S. Stone
David S. Stone
Managing Partner

cc: AUSA Anthony Torntore (via CM/ECF and email)
David Hernandez (via email only)